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Attorneys for Defendant  
TARGET CORPORATION

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

RAUL TORRES, an individual,

Plaintiff,

vs.

TARGET CORPORATION, a  
Minnesota corporation; TARGET  
BRANDS, INC., a Minnesota  
corporation; and DOES 1-10,  
inclusive.

Defendants.

Case No.: 2:17-cv-04007 ODW (AFMx)

Hon. Otis D. Wright II

**DECLARATION OF PETER M.  
ROUTHIER IN SUPPORT OF  
TARGET CORPORATION'S  
MOTION TO TRANSFER VENUE  
PURSUANT TO 28 USC § 1404(a)**

Date: August 28, 2017  
Time: 1:30 p.m.  
Courtroom: 5D

**DECLARATION OF PETER M. ROUTHIER**

I, Peter M. Routhier, being of lawful age, state that the following facts are true and correct to the best of my knowledge and belief:

1. I am an attorney with the law firm Faegre Baker Daniels LLP. I make this declaration upon my personal knowledge and upon review of the materials and exhibits identified below.

2. Attached as Exhibit A is a copy of a webpage entitled “NYC Street Artist, HEKTAD Taking Over City’s Walls” as retrieved from <http://www.sonofasouthernchef.com/blog/nyc-street-artist-hektad-taking-over-citys-walls4283425>, accessed July 21, 2017.

3. Attached as Exhibit B is a copy of a webpage entitled “Paddle8 — Love is Power” as retrieved from <https://paddle8.com/work/hektad/127095-love-is-power>, accessed July 21, 2017.

4. I met and conferred with Plaintiff’s counsel, Mr. David Erikson, on July 13, 2017, regarding Target Corporation’s intent to file a motion to transfer venue to the United States District Court for the District of Minnesota.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 31, 2017

/s/ Peter M. Routhier  
Peter M. Routhier